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To: Honorable Taryn A. Merkl

Re: Defendants' Response to Plaintiff's Motion *in Limine* – Case No. 20cv05594-TAM

Your Honor:

The Defendants' main witness from Grenada (Peter Ashton) has agreed to testify in person, therefore, there is no need at this point for anyone to testify remotely. Defendants' witnesses will be as follows: Oleg Tsimbler, Svitlana Krushelnytska, Natalya Gritsayuk, and Peter Ashton.

Dated: December 28, 2023

Respectfully submitted,


Garry Pogil (Attorney for the Defendants)